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May 5, 2023

VIA ECF

Chief Magistrate Judge Cheryl Pollak
United States District Court- Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Jean Marc Charles v. Slade Industries, Inc.
Civil Action No.: 1:19-cv-03013-NGG-SMG

Dear Judge Pollak:

Pursuant to Your Honor's April 25, 2023 Order, the parties hereby submit this joint status report.

The parties have been working together to complete discovery, initial written discovery is complete, an inspection of the elevator at issue has occurred, and the following depositions have been completed:

- Plaintiff- September 3, 2020 and November 15, 2022
- Eric Tranquellino (Slade mechanic)- December 8, 2022
- Frederick Hoch (Inclinorator)- January 27, 2023
- Vish Shetty (Third party witness)- February 8, 2023.

Slade has also responded to additional written discovery demands propounded by plaintiff.

Plaintiff appeared for an examination with orthopedist, Dr. Andrew Bazos, on May 4, 2023. Defendants Slade Industries, Inc. and Inclinorator Company of America anticipate at least one additional exam of plaintiff.

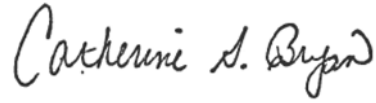
Two additional Slade witnesses, Pavel Rudnitsky and Angel Torres, are set to proceed on May 5, 2023. At the conclusion of these depositions, the parties will determine if additional fact discovery is needed. Plaintiff expects that there will be two additional non-party depositions of Slade/former Slade employees.

Plaintiff respectfully requests this Court to set a discovery end date schedule since some of the prior deadlines may have passed.

May 5, 2023

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Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Catherine G. Bryan". The signature is written in a cursive, flowing style.

Catherine G. Bryan

cc: Paul Koenigsberg, Esq. (*via ECF*)
Peter Iannace, Esq. (Admission pending – via email) (*via ECF*)